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7 Attorneys for Defendant
8 DOLLAR TREE STORES, INC.

9
10 **UNITED STATES DISTRICT COURT**
11
12 **DISTRICT OF NEVADA**

13 * * * *

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15 YELE GLASTER, individually,)
16 Plaintiff,)
17 vs.)
18 DOLLAR TREE STORES, INC., a)
19 foreign corporation; DOES I - X, and)
20 ROE CORPORATIONS XI - XX,)
21 inclusive,)
22 Defendant.)
23
24

25 CASE NO.

26 TO: THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEVADA:

27 Defendant DOLLAR TREE STORES, INC. respectfully shows:

28 1. The above-entitled action was commenced in the Eighth Judicial District Court
for the State of Nevada, in and for the County of Clark, and is now pending in that court. Process
was served upon Defendant DOLLAR TREE STORES, INC. on January 15, 2015. Copies of
said Summons and Complaint are attached hereto as Exhibits "A" and "B," respectively.

29 2. This Petition is timely filed pursuant to 28 U.S.C.A. § 1446(b).

30 3. Defendant has answered Plaintiff's Complaint, and Plaintiff has filed a Petition
for Exemption from Mandatory Arbitration, attached hereto as Exhibits "C" and "D,"
31 respectively. Aside from these pleadings, Defendant is informed and believes and thereon
32 alleges that there have been no further proceedings or papers filed in said action.

4. This action is a civil action of which this Court has original jurisdiction under the provisions of 28 U.S.C.A. § 1332 and is one which may be removed to this Court by Defendants pursuant to the provisions of 28 U.S.C.A. § 1441(b), in that it is a civil action wherein the matter in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs, and is between citizens of different States and a foreign state.

5. Defendants are informed and believe and thereon allege that Plaintiff YELE GLASTER, at the time of commencing this action was, and still is, a resident of the State of Nevada.

6. Defendant DOLLAR TREE STORES, INC. at the time of commencing this action was, and still is, a Virginia Corporation with its principal place of business in the State of Virginia.

7. A copy of the instant Notice for Removal of Civil Action of the above-entitled action to the United States District Court, District of Nevada, together with copies of the Summons and Complaint have been deposited with the County Clerk's Office for the Eighth Judicial District, in and for the County of Clark, Nevada.

8. This Notice of Removal of Civil Action is filed with this Court within thirty (30) days after receipt by Defendants of the Complaint in the above-entitled action.

WHEREFORE, Defendants pray that the above-entitled action be removed from the Eighth Judicial District Court, in and for the County of Clark, Nevada to this Court.

DATED this 12th day of February, 2015.

OLSON, CANNON, GORMLEY,
ANGULO & STOBERSKI

By 

JAMES R. OLSON, ESQ.
STEPHANIE M. ZINNA, ESQ.
9950 West Cheyenne Avenue
Las Vegas, Nevada 89129
Attorneys for Defendant
Dollar Tree Stores, Inc.

AFFIDAVIT OF STEPHANIE ZINNA, ESQ.

STATE OF NEVADA)
COUNTY OF CLARK)

I, Stephanie Zinna, being duly-sworn hereby depose and affirm

1. That Affiant is a duly-licensed attorney practicing law in the State of Nevada, Bar No. 011488, with the law firm of OLSON, CANNON, GORMLEY, ANGULO & STOBERSKI, maintaining offices at 9950 West Cheyenne Avenue, Las Vegas, Nevada 89129;

2. That Affiant is the attorney for Defendant DOLLAR TREE STORES, INC.;

3. That Affiant has prepared and read the foregoing Notice of Removal of Civil

Action and knows the matters set forth and contained therein to be true and correct to the best of your Affiant's knowledge and belief;

4. That Affiant caused to be filed with the Clerk of the Eighth Judicial District Court a copy of Defendants' Notice of Removal of Civil Action of the above-entitled action to the United States District Court for the District of Nevada at Las Vegas, together with a copy of the Summons and the Complaint, by depositing such copies with the Deputy Clerk in the Clerk's office for the Eighth Judicial District Court of the State of Nevada at the office of the County Clerk, Regional Justice Center, 200 Lewis Avenue, Las Vegas, Nevada 89101.

5. That Affiant caused to be served a Notice and a copy of the Notice of Removal of Civil Action on Anthony M. Paglia, Esq., attorney of record for the YELE GLASTER in the above-entitled action by depositing the same in the United States mail on February 14, 2014, in

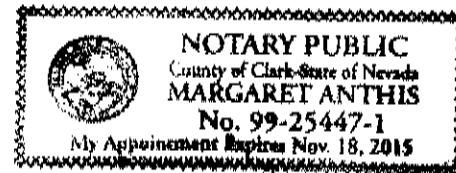
1 an envelope properly addressed to Anthony M. Paglia, Esq., Antony Paglia Injury Lawyer, Ltd.
2 255 East Warm Springs Road, #100A Las Vegas, NV 89129.

3 FURTHER AFFIANT SAYETH NAUGHT.

4
5
6 STEPHANIE ZINNA
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9 SUBSCRIBED AND SWORN to before me
10 this 17 day of February, 2015.

11 
12 NOTARY PUBLIC in and for said
13 County and State



14 CERTIFICATE OF SERVICE

15 I HEREBY CERTIFY that on the 17 day of February, 2014, I served the above
16 DEFENDANTS NOTICE OF REMOVAL through the CM/ECF system of the United States
17 District Court for the District of Nevada (or, if necessary, by U.S. Mail, first class, postage pre-
18 paid), upon the following:

19 Anthony M. Paglia, Esq.
20 Antony Paglia Injury Lawyer, Ltd.
21 255 East Warm Springs Road, #100A
22 Las Vegas, NV 89129
23 P: 702-830-7070
24 F: 702-522-054
25 apaglia@anthonypaglia.com
26 Attorneys for Plaintiff

27 
28 An Employee of Olson Cannon Gormley
29 Angulo & Stoberski